

ROBERT MARINELLI
ATTORNEY
305 BROADWAY, 10TH FLOOR
NEW YORK, NEW YORK 10007
(212) 822-1427
Facsimile (212) 202-9646

April 11, 2019

Honorable James Orenstein
United States Magistrate Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: *Denmark v. City of New York*, 18-CV-1224 (CBA)(JO)

Your Honor:

I represent plaintiff Shatee Denmark and write, with defendants' consent, to request a thirty-day stay of the proceedings. Discovery is currently scheduled to conclude on April 26, 2019. I respectfully request a corresponding extension of discovery until May 25.

The parties have completed paper discovery and were on track to meet the Court's deadlines. However, I have been unable to get in contact with plaintiff to produce him for his deposition. Upon information and belief, Mr. Denmark has moved and may be in the shelter system.

I am in the process of hiring a private detective and believe that if this stay is granted, I will locate plaintiff and he will fully participate in this litigation.

I thank the Court for consideration of this request.

Sincerely,

/s

Robert Marinelli, Esq.

Cc: ACC Geoffrey Stannard